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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

KARISMA GARCIA,

Plaintiff,

vs.

STATE OF NEVADA, et al.,

Defendants.

Case No. 2:17-cv-00359-APG-VCF

**JOINT MOTION TO EXTEND
DISPOSTIVE MOTION DEADLINE
(FIFTH REQUEST)**

The Parties hereby move to extend the time to complete dispositive motions from June 1, 2021, to August 2, 2021. Good cause supports this extension request as it will allow the parties to engage in settlement discussions to resolve this matter.

1 **I. PROCEDURAL POSTURE**

2 **A. Discovery Completed Pursuant To Local Rule 26-3¹**

3 To date, Garcia disclosed all of the documents in her possession on July 6, 2020.
4 Defendants disclosed all of the documents in its possession on August 11, 2020. Defendants
5 provided Garcia with a PDF of all prison medical files on January 26, 2021. Garcia provided
6 a first supplement to her initial disclosures on March 26, 2021.

7 **B. Reasons That Dispositive Motions Cannot Be Completed Within The**
8 **Date Set By Scheduling Order**

9 On Friday, May 21, 2021, Senior Deputy Attorney General Katlyn M. Brady was
10 assigned to assist in this matter and draft any dispositive motions. Counsel spent the
11 following weekend, and several workdays, familiarizing herself with this matter.

12 Further, defense counsel and plaintiff's counsel have begun preliminary discussions
13 regarding settling this matter prior to dispositive motions. Both parties believe a
14 settlement in this matter may be possible. Thus, both parties have agreed to extend the
15 deadline for dispositive motions to allow for settlement discussions.

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18 ¹ LR 26-3. EXTENSION OF SCHEDULED DEADLINES:

19 A motion or stipulation to extend any date set by the discovery
20 plan, scheduling order, or other order must, in addition to
21 satisfying the requirements of LR IA 6-1, be supported by a
22 showing of good cause for the extension. A motion or stipulation
23 to extend a deadline set forth in a discovery plan must be
24 received by the court no later than 21 days before the expiration
25 of the subject deadline. A request made within 21 days of the
26 subject deadline must be supported by a showing of good cause.
27 A request made after the expiration of the subject deadline will
28 not be granted unless the movant also demonstrates that the
failure to act was the result of excusable neglect. A motion or
stipulation to extend a discovery deadline or to reopen discovery
must include:

- (a) A statement specifying the discovery completed;
- (b) A specific description of the discovery that remains to be completed;
- (c) The reasons why the deadline was not satisfied or the remaining discovery was not completed within the time limits set by the discovery plan; and
- (d) A proposed schedule for completing all remaining discovery.

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1 **III. CONCLUSION**

2 Based upon the foregoing reasons, the Parties request that this Court grant the
3 requested relief and continue deadlines as requested herein.
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5 DATED this 1st day of June, 2021

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7 By: /s/ Lisa A. Rasmussen
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10 Associates
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DATED this 1st day of June, 2021

By: /s/ Katlyn M. Brady
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13 IT IS SO ORDERED

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15 UNITED STATES MAGISTRATE JUDGE

16 6-3-2021
17 DATE: _____
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